



## San Diego County Water Authority

4677 Overland Avenue • San Diego, California 92123-1233  
(858) 522-6600 FAX (858) 522-6568 [www.sdcwa.org](http://www.sdcwa.org)

July 20, 2005

Paul Dabbs, Chief  
Water Resources Evaluation Section  
Statewide Water Planning Branch  
California Department of Water Resources  
PO Box 942836  
Sacramento, CA 94236-0001

RE: Comments on California Water Plan Update 2005

Dear Mr. Dabbs:

The Water Authority appreciates the opportunity to provide comments on the California Water Plan Update 2005 (Water Plan Update). While this Water Plan Update serves as a strong strategic planning document, the true success of the strategies and recommendations can only be demonstrated when demand and supply scenarios are presented. The following are general comments on Volume 1, Strategic Plan, of the Water Plan Update. Enclosed you will find more detailed written comments on chapters included in Volumes 2 and 3 of the Water Plan Update.

### Using Water Efficiently

The Water Authority is encouraged to see that one of the Foundational Actions of the Water Plan Update is to use water efficiently and that this definition has been broadened to include not only water conservation and water recycling, but also water transfers.

The Water Authority is a leader in the state in regard to implementation of long-term water conservation programs. The Water Authority is one of the original signatories to the Memorandum of Understanding Regarding Urban Water Conservation in California and has successfully implemented the urban conservation BMPs. In addition, water conservation programs in the Water Authority's service area have saved approximately 357,000 acre-feet of water since demand management programs were first implemented in 1991.

However, the Water Authority knows that implementation of conservation measures alone cannot provide the reliable water supply necessary to meet the existing and future water demands of the region; and that a diverse portfolio is critical for the San Diego region.

*A public agency providing a safe and reliable water supply to the San Diego region*

#### MEMBER AGENCIES

Carlsbad  
Municipal Water District

City of Del Mar

City of Escondido

City of National City

City of Oceanside

City of Poway

City of San Diego

Fallbrook  
Public Utility District

Helix Water District

Olivewood  
Municipal Water District

Otay Water District

Padre Dam  
Municipal Water District

Camp Pendleton  
Marine Corps Base

Rainbow  
Municipal Water District

Ramona  
Municipal Water District

Rincon del Diablo  
Municipal Water District

San Dieguito Water District

Santa Fe Irrigation District

South Bay Irrigation District

Vallecitos Water District

Valley Center  
Municipal Water District

Vista Irrigation District

Yuima  
Municipal Water District

#### OTHER REPRESENTATIVE

County of San Diego

### Supply Diversification

The Water Authority is encouraged that the first initiative in the Water Plan Update, "Promote and Implement Integrated Regional Water Management" includes, as an element, diverse regional water portfolios, and that implementation of a single water management strategy cannot ensure reliability.

As mentioned in the Water Plan Update, "A diverse portfolio of water management strategies is essential to provide the flexibility needed to cope with changing and uncertain future conditions." The Water Plan Update also states that, "California regions cannot meet all of their water objectives with a single strategy." The Water Authority supports these positions that are fundamental to ensuring a reliable supply for the local regions and for the State, and should be emphasized more strongly in the Water Plan Update.

In addition, the Water Authority supports the Water Plan Update concept that, "...the combination of strategies varies from region to region depending on the individual situations surrounding water supply and use..." For example, regions in the Central Valley have groundwater supplies to manage and provide supply reliability to their region. The Water Authority has limited groundwater supplies, so has in turn, pursued water transfers and seawater desalination as resource management strategies to ensure reliability. It is not one size fits all. This is an important concept that should also be more strongly emphasized in the Water Plan Update.

### Integrated Regional Water Management

Another area of support for the Water Plan Update is the emphasis placed on implementation of integrated regional water management. The Water Authority, the County of San Diego, and the City of San Diego have recently teamed-up to form a regional water management group to prepare an integrated regional water management plan for San Diego County. The plan will bring together the issues of water supply reliability, water quality, and habitat improvement into one document. As part of this effort, the Water Authority is also forming a strong stakeholder alliance with agencies and organizations throughout the County interested in watershed planning and supply reliability. The integrated plan and associated potential projects will be consistent with Proposition 50, Chapter 8 grant program guidelines. The Water Authority submitted an application for project funding in July.

The Water Authority encourages DWR to include the results from this local planning effort, along with the 2005 Urban Water Management Plan Updates, in development of the 2010 Update of the Water Plan.

### Water Plan Update Implementation Plan

Based on the experiences of the Water Authority and its member agencies in trying to diversify the region's water supply sources, the Water Authority suggests that the following items be addressed in the Implementation Plan for the Water Plan Update:

One of the major impediments to development of water recycling projects within the San Diego region are the regulatory hurdles that must be overcome to implement and operate these projects. An action should be included in the recommendations that requires the State and local regulatory agencies to work closely and cooperatively with project proponents in their efforts to satisfy the regulations and still be able to develop a much needed, cost-effective water recycling project.

Recommendation 7, Clarify State, Federal, and Local Roles and Responsibilities, should include the role of the California Coastal Commission. The Coastal Commission plays a significant role in the approval of seawater desalination supplies along the coast of California. This agency should be added to the list of State agencies involved in water management included on page 3-35.

- The Water Authority commends DWR for acknowledging the State's role in providing funding for implementation of local strategies. Development of these local supplies now serves as the foundation for water supply reliability statewide. One comment the Water Authority has on this item, based on feedback from our member agencies is the costs and resources necessary to take advantage of the funding. This will often discourage local agencies from applying for funding and moving forward on a project. The Water Authority suggests an action that calls on the State to ensure a funding process that is clear, consistent, and streamlined.

#### Lack of Water Balance

A critical element missing from the Water Plan Update is a water balance that shows how California's growing demands for water will be met. Without a water balance it is difficult to make a determination as to whether the framework and recommendations included in the Water Plan Update will successfully meet the diverse water needs of the state.

Thank you again for the opportunity to comment on the Water Plan Update. The Water Authority believes overall that the Water Plan Update provides the strategic planning guidance necessary to go into Phase 3 of this effort - preparation of the 2010 Water Plan Update - where DWR will analyze future scenarios and alternative mixes of resource management strategies to identify the regional mixes of strategies to meet future water demands of the State. The Water Authority looks forward to being involved in this process and hopes that seawater desalination is identified as one of the effective management strategies for the region.

Sincerely,



Ken Weinberg  
Director of Water Resources

JS  
Enclosure

**San Diego County Water Authority – Comments on the California Water Plan Update 2005**

Volume	Chapter	Page	Comment
2	4	4-6	In regards to the “Recommendations to Help Promote Additional Conjunctive Management” – Consider state funding and support of local agency development of groundwater basin DATABASES that can be accessed via the Internet. The database could be maintained by the managing agency and be available to all stakeholders and the general public, as well as state and federal agencies. Part of this effort would be to develop a STATEWIDE STANDARDS for Internet water resource database development and maintenance. Databases could also be linked to other regional resource databases.
2	5	5-1	Fourth paragraph, first sentence: The two largest conveyance projects in California, based on water delivered on a consistent annual basis, are the CVP and the All-American Canal. The latter delivers approximately 3.1 MAF year in and year out, while the SWP only occasionally delivers that amount of water.
2	5	5-3	Sixth paragraph, first sentence: MWD has a network of “regional,” not “local,” conveyance facilities, which deliver water to local conveyance systems.
2	5	5-3	Seventh paragraph, third sentence: You should call out water quality improvement as well as supply reliability, as in “It is important to recognize that, in some cases, improving water supply reliability through system flexibility <u>or improving water quality</u> is just as valuable as increasing overall supply.”
2	5	5-4	Fourth bullet point: To fully realize the benefits of capturing additional water during high flows requires increased storage capacity as well as improved conveyance capacities.
2	5	5-4 & 5-5	Major Issues Facing Conveyance - Another major issue is achieving the conveyance goals established for the All-American Canal in the QSA. As part of the QSA, the Water Authority accepted assignment of the Metropolitan Water District's water rights to 77,700 acre-feet per year for 110 years from projects that will line the All-American and Coachella canals. The project will stop the loss of water that currently occurs through seepage, and that conserved water will go to the Water Authority. This will provide the San Diego region with an additional 8.5 million acre-feet of water over the 110-year life of the agreement, thus allowing the Water Authority to diversify the regional water supply and potentially reduce the need for more water from the Bay-Delta in the future.
2	5	5-5	Major Issues, CALFED Through-Delta Strategy section - The lack of conveyance flexibility in the Delta also limits the SWP's ability to improve water quality for both exporters and in-Delta users.
2	5	5-6	Ensure that permitted pumping at the SWP's Banks Plant increases to 8,500 CFS and, eventually, to 10,300 CFS, as specified in the CALFED ROD.
2	5	5-6	Ensure that the screened through-Delta facility on the Sacramento River is installed and evaluated as specified in the CALFED ROD.
2	9	9-1	First paragraph – Delete sentence “Ecosystem restoration can include changing the flows in streams and rivers, restoring fish and wildlife habitat, controlling waste discharge into streams, rivers, lakes or reservoirs, or removing barriers in streams and rivers so salmon and steelhead can spawn.”
2	9	9-1	Third paragraph – Revise sentence, “The majority of private lands provide wildlife habitat.” To read, “Many private landowners voluntarily provide wildlife habitat even as they actively use their land.”
2	9	9-2	Second paragraph – Revise sentence to read, “Ability to sustain all life stages of native fish is an example of a function that some California rivers no longer provide as well as they once did.”
2	9	9-2	Third paragraph – Revise sentence to read, “The California Environmental Quality Act recognizes that human activity may affect the natural environment, and outlines procedures for the project proponents to avoid, minimize, and mitigate impacts.”
2	9	9-2	Third paragraph – Revise sentence to read, “By contrast, ecosystem restoration is intended to raise the overall level of ecosystem health.”
2	9	9-3	Third paragraph – Revise to read, “Restoration can benefit plant and animal life, increase diversity and connectivity of habitat, help endangered species, and improve watersheds.”

**San Diego County Water Authority – Comments on the California Water Plan Update 2005**

Volume	Chapter	Page	Comment
2	9	9-4	First paragraph – Revise to read, “Preliminary estimates indicate that ecosystem restoration costs to year 2030 could total \$7.5 billion to \$11.3 billion.”
2	9	9-4	Cost of Ecosystem Restoration section - Only CALFED is discussed. What about others?
2	9	9-4 & 9-5	Seventh paragraph – Revise to read, “When sensitive resources and endangered species are involved, we often do not have the time or money to fully develop our scientific understanding before action is needed.”
2	11	11-17	Sixth bullet – Water conserved by reducing seepage will be transferred to San Diego and the San Luis Rey Indian Tribes. The Parties will share proportionally in any incremental increase of operation and maintenance cost.
2	23	--	Water Transfers – There is no direct reference to the Quantification Settlement Agreement-related transfers. Is that by design?
2	17	17-1	Second paragraph - We appreciate that the Water Plan recognizes that “more storage is crucial to successfully meeting” CALFED’s goals.
2	17	17-2	Page 17-2, last paragraph - We appreciate that the Water Plan recognizes that the surface storage projects under study by CALFED may improve water quality as well as supply reliability.
2	17	17-3	Page 17-3, sidebar: Another good example of a locally developed offstream surface storage project is the Olivenhain Reservoir (24,300-af capacity), which the San Diego County Water Authority completed in 2003. Like the Los Vaqueros and Diamond Valley reservoirs, Olivenhain does not have supply augmentation as a primary objective. Rather, it was constructed to help meet the San Diego region’s water needs during an emergency such as an earthquake that cuts San Diego off from its imported water supplies.
2	17	17-5	Page 17-5, Recommendation 1, third bullet point - It is unrealistic to state that the agencies should develop “complete information” on potential project operations. Instead, the agencies should determine how much information is necessary to adequately evaluate the projects and then develop that amount of information for each so they can do an “apples to apples” comparison in a reasonable time period. We need to reach the point of deciding which, if any, of the projects to build sooner rather than later.
2	17	17-6	Page 17-6, Recommendation 1, fifth bullet point: Development of “mechanisms to provide assurances that projects will be operated in a manner consistent with the objectives” is absolutely essential and cannot be emphasized strongly enough. Support from all stakeholders may not be possible in the area of surface storage, but without iron-clad assurances it will be impossible to obtain.
2	19	19-1	System Reoperation - General comment: After reading this section, it seems to concern only the Bay-Delta system. If this is so, it should be specified up-front.
2	19	19-1	Sidebar, Examples of System Reoperation - Another example you may wish to add is adding conveyance connections to a regional or local system to make the system more flexible and, thus, improve reliability during conditions such as earthquakes or prolonged drought.
2	19	19-7	Additional “major issue facing system reoperation”- Promote and support integrated regional water management planning as a component of potential reoperation strategies involving local, regional and/or state facilities.
3	5	5-3	There are no formal recycled water recharge projects within the SDCWA service area. There is some incidental recharge of groundwater by wastewater-disposal operations, but these are not recycled water recharge projects.
3	5	5-4	Third paragraph, last sentence – SDCWA received delivery of 10,000 acre-feet of conserved water in 2003 and 20,000 acre-feet in 2004. Deliveries in 2005 will total 30,000 acre-feet and increase annually until they reach 200,000 acre-feet in 2021.



San Diego County Water Authority – Comments on the California Water Plan Update 2005			
Volume	Chapter	Page	Comment
3	5	5-6	Bottom paragraph ... "These basins [includes Mission Basin in Oceanside] have only recently been restored through brackish water desalting projects." Comment – the Mission [groundwater] Basin on the San Luis Rey River has not been "restored." The groundwater in the basin is still brackish, but is being recovered and treated to drinking water levels by the City of Oceanside Mission Basin Groundwater Repurification Facility.
3	5	5-9	Second paragraph – SDCWA finished construction of Olivenhain Reservoir in 2003 and completed filling its 24,000 acre-foot capacity with imported water in 2005.